IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

RONALD MELTON, et al. : CASE NO. C-1-01-528

Plaintiffs : (Judge Spiegel)

vs. :

BOARD OF COUNTY COMMISSIONERS OF HAMILTON COUNTY, OHIO, et al. :

Defendants :

PLAINTIFFS' MEMORANDUM IN OPPOSITION TO DEFENDANTS' MOTION TO COMPEL DISCOVERY

Plaintiffs respectfully move this Honorable Court to deny Defendants' motion to compel discovery. Plaintiffs disagree that they have not produced all that they have available and unobjectionable in response to the discovery requests of the Movants. In addition, Plaintiffs have continually supplemented their discovery responses as additional information and documentation becomes available to he undersigned counsel which is responsive to the Movants discovery served on Plaintiffs; whether or not supplementation is required by the Civil Rules. Additionally, Plaintiffs have consistently advised the Movants that they intend to continue to provide supplementation to their prior discovery responses as same becomes available to them in the future. For said reasons, Plaintiffs posit that the motion to compel is not well-taken and should be denied.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been served on opposing counsel by electronic service through the CM/ECF filing program at their respective e-mail addresses by this 22nd day of January, 2004.

/s/ Michael B. Ganson (0015944)
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